

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

A-1 DETECTIVE AND PATROL  
SERVICE, INC.

PLAINTIFF

v.

CAUSE NO. 3:18-cv-560-HTW-LRA

JURY TRIAL DEMANDED

CAMBRIDGE SECURITY SERVICES  
CORP.

DEFENDANT

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MOTION FOR CLERK'S ENTRY OF DEFAULT

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Pursuant to Fed. R. Civ. P. 55(a), Plaintiff A-1 Detective and Patrol Service, Inc. ("A-1") moves the clerk for an entry of default against Defendant Cambridge Security Services Corp. ("Defendant") and states as follows:

1. On November 13, 2018, A-1 filed its Amended Complaint (Doc. No. 6). *See* Am. Compl., Ex. 1 to Affidavit of Anna Little Morris, Ex. A hereto.

2. The same day, the Court issued a Summons (Doc. No. 7) to Defendant's registered agent in Florida, a state in which Defendant has its Southeast Regional Headquarters<sup>1</sup> (the "Florida Registered Agent"). The Florida Registered Agent is located at 5100 N. Federal Highway, Suite 405, Ft. Lauderdale, Florida 33008. *See* Summons, Ex. 2 to Affidavit of Anna Little Morris, Ex. A hereto.

3. On November 26, 2018, A-1 served Defendant with a copy of the Summons and Amended Complaint via certified mail, return receipt requested, relying upon Fed. R. Civ. P. 4(h)(1)(A) and 4(e)(1) and Miss. R. Civ. P. 4(c)(5). *See* Return of Service, Ex. 3 to Affidavit of Anna Little Morris, Ex. A hereto.

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<sup>1</sup> *See* <https://www.cambridgesecurityservices.com/contact/>.

4. As of the date of this Motion, Defendant has not filed an Answer or other responsive pleading.

5. Therefore, more than thirty (30) days have passed since Defendant was served with process, and no answer or other responsive pleading has been filed.

WHEREFORE, based upon Defendant's failure to appear and defend in this action, Plaintiff A-1 Detective and Patrol Service, Inc. requests that the Clerk enter a default against Defendant Cambridge Security Services Corp.

Dated: January 3, 2019.

Respectfully submitted,

A-1 DETECTIVE AND PATROL SERVICE, INC.

By: /s/ Anna Little Morris

Brian Kimball (Miss. Bar No. 100787)

Anna Little Morris (Miss. Bar No. 105299)

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*ITS ATTORNEYS*

### **CERTIFICATE OF SERVICE**

I, Anna Little Morris, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the ECF system.

SO CERTIFIED, this the 3rd day of January, 2019.

/s/ Anna Little Morris

ANNA LITTLE MORRIS